UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN KALAMAZOO DIVISION

Lorie Bevins,	Case No. 1:21-cv-1070-RJJ-RSK
Plaintiff,	
V.	PLAINTIFF'S MOTION TO
Zenresolve, LLC,	SUBSTITUTE DEFENDANT
Defendant.	

Now comes Plaintiff, by and through counsel, and respectfully moves the Court to substitute the Defendant. In support of this Motion, Plaintiff represents that the Complaint was filed against ZenResolve, LLC and served upon:

Zenresolve, LLC c/o The Corporation Company 40600 Ann Arbor Road East, Suite 201 Plymouth, MI 48170

After the Entry of Default being entered, in communications with Defendant, Defendant claims that the company served ceased to exist. Despite having the same telephone contact information and logo, in email communications, Defendant alleges that Plaintiff served the Michigan-incorporated ZenResolve, LLC when the proper party was the Wyoming-incorporated ZenResolve, LLC. (See Exhibit A). Based on the foregoing, Plaintiff respectfully requests to substitute the Defendant for the following:

Zenresolve, LLC c/o CT Corporation System 3800 North Central Avenue, Suite 460 Phoenix, AZ 85012 Based on the foregoing, Plaintiff respectfully moves to substitute the Defendant and instruct the Clerk to adjust the docket accordingly.

RESPECTFULLY SUBMITTED,

The Litigation Practice Group

By: <u>/s/ Richard J. Meier</u> Richard J. Meier, Esq. 17542 E. 17th Street, Suite 100 Tustin, CA 92780

Tel: 657-600-9790 Fax: 949-315-4332 richard@lpglaw.com Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that, on March 14, 2022, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. The following parties were served through U.S. Mail.

Zenresolve, LLC c/o CT Corporation System 3800 North Central Avenue, Suite 460 Phoenix, AZ 85012

/s/ Richard J. Meier